

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

HASSANIN ALY,)	CASE NO: 5:12-CV-06069
)	
Plaintiff,)	
)	
v.)	JOINT STIPULATION AND
)	MOTION TO EXTEND
HANZADA for IMPORT & EXPORT)	
COMPANY, LTD.,)	
)	
Defendant.)	

Plaintiff, Hassanin Aly, and Defendant, Hanzada for Import & Export Company, Ltd., by and through the undersigned counsel and pursuant to Local Rule 16.3, hereby jointly stipulate and move this Court for an Order extending the deadline for filing discovery motions to July 31, 2015, extending the deadline for completing discovery until August 17, 2015, and extending the deadline for filing dispositive motions to September 30, 2015, as set forth in the proposed Amendment to Scheduling and Trial Order that is attached hereto and marked as Exhibit A.

In support of this motion the parties show to the Court that they have been engaged in active discovery as evidenced by the Certification of Service of Plaintiff's Rule 26 Initial Disclosures on November 14, 2014 (Doc. 52), Certification of Service of Defendant's Rule 26 Initial Disclosures on March 27, 2015 (Doc. 62), and Certification of Service of Plaintiff's Interrogatories to Defendant (First Set) and Plaintiff's Requests for Production to Defendant (First Set) on April 9, 2015 (Doc. 63). The parties also show that Plaintiff issued a Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action to National Beef Packing Company, LLC ("National Beef") on March 13, 2015, which National Beef responded to on or about April 16, 2015.

However, because Defendant is an Egyptian business located in Cairo, Egypt, a significant amount of time has been needed to obtain and translate the documentation Defendant intends to produce in response to Plaintiff's requests for production. Despite conferring with Defendant pursuant to Local Rule 37.1, Plaintiff is still waiting to receive Defendant's answers and responses to Plaintiff's Interrogatories and Requests for Production, and the parties are currently discussing the terms of a proposed protective order because Defendant considers Plaintiff a competitor. After receiving Defendant's discovery responses, Plaintiff intends to take the depositions of two executives from National Beef, the dates of which may need to be extended beyond the discovery deadline set forth in the Court's Scheduling and Trial Order (Doc. 50) due to limited time remaining for discovery. Defendant is also seeking to depose Plaintiff.

Notwithstanding, Plaintiff is scheduled to take the deposition of Mr. Mark Domanski of National Beef in Chicago, Illinois on June 26, 2015 beginning at 9:00 a.m., and the deposition of Mr. Tim Kline of National Beef in Kansas City, Missouri on June 30, 2015 beginning at 9:00 a.m. Defendant also plans on taking Plaintiff's deposition in the month of July in Omaha, Nebraska.

WHEREFORE, the parties jointly stipulate and pray that this Court enter an Order extending the deadline for filing discovery motions to July 31, 2015, extending the deadline for completing discovery until August 17, 2015, and extending the deadline for filing dispositive motions to September 30, 2015, as set forth in the attached proposed Amendment to Scheduling and Trial Order.

Dated this 18th day of June, 2015.

HASSANIN ALY,
Plaintiff,

HANZADA FOR IMPORT &
EXPORT COMPANY, LTD.,
Defendant,

By: /s/Kevin D. Weakley
Kevin D. Weakley, MO #53455
Wallace Saunders Austin Brown &
Enochs, Chartered Attorneys at Law
10111 W. 87th Street
Overland Park, Kansas 66212
(913) 888-1000
(913) 888-1065 fax
Attorneys for Plaintiff

By: /s/Brent Nicholls
Brent Nicholls, #22146
Kasaby & Nicholls, LLC
The Empire State Building
300 South 19th Street, Suite 300
Omaha, NE 68102
(402) 502-0600

And

By: /s/Nicholas F. Sullivan
Richard J. Gilloon, NE Bar #15397
Nicholas F. Sullivan, NE Bar #25351
ERICKSON | SEDERSTROM, P.C.
10330 Regency Parkway Drive
Omaha, Nebraska 68114
(402) 397-2200
(402) 390-7137 Fax
gilloon@eslaw.com
nsull@eslaw.com
Attorneys for Plaintiff
Pro Hac Vice

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing Joint Stipulation and Motion to Extend was electronically filed with the Clerk of Court using the CM/ECF system, which sent notification of this filing on June 18, 2015, to the following CM/ECF participants:

Brent Nicholls
brent@knlawpc.com

Edwin H. Smith
esmith@polsinelli.com

Kevin D. Weakley
kweakley@wallacesaunders.com

Richard J. Gilloon
gilloon@eslaw.com

/s/Nicholas F. Sullivan
Nicholas F. Sullivan